Hazard Communication Program

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The template containing the sample written Hazard Communication Program can be obtained from the Cabinet Safety Coordinator.

Hazard Communication Guidelines for Compliance

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Introduction 1

OSHA's Hazard Communication Standard (HCS) is based on a simple concept—that employees have both a need and a right to know the hazards and identities of the chemicals they are exposed to when working. They also need to know what protective measures are available to prevent adverse effects from occurring. OSHA designed the HCS to provide employees with the information they need to know.

Knowledge acquired under the HCS will help employers provide safer workplaces for their employees. When employees have information about the chemicals being used, they can take steps to reduce exposures, substitute less hazardous materials, and establish proper work practices. These efforts will help prevent the occurrence of work-related illnesses and injuries caused by chemicals.

The HCS addresses the issues of evaluating and communicating chemical hazard information to workers. Evaluation of chemical hazards involves a number of technical concepts, and is a process that requires the professional judgment of experienced experts. That's why the HCS is designed so that employers who simply use chemicals—rather than produce or import them—are not required to evaluate the hazards of those chemicals. Hazard determination is the responsibility of the manufacturers and importers of the chemicals, who then must provide the hazard information to employers that purchase their products

Employers that do not produce or import chemicals need only focus on those parts of the rule that deal with establishing a workplace program and communicating information to their workers. This publication is a general guide for such employers to help them determine what the HCS requires. It does not supplant or substitute for the regulatory provisions, but rather provides a simplified outline of the steps an average employer would follow to meet those requirements.

OSHA has provided a simple summary of the HCS in a pamphlet entitled *Chemical Hazard Communication (OSHA 3084).* Some employers prefer to familiarize themselves with the rule's requirements by reading this pamphlet. A single, free copy may be obtained from your local OSHA Area Office, or by contacting the OSHA Publications Office at (202) 693-1888.

The standard itself is long and some parts are technical, but the basic concepts are simple. In fact, the requirements reflect what many employers have been doing for years. You may find that you already largely comply with many of the provisions and will simply have to modify your existing programs somewhat. If you are operating in an OSHA-approved State Plan State, you must comply with the State's requirements, which may be different than those of the Federal rule. Many of the State Plan States had hazard communication or "right-to-know" laws prior to promulgation of the federal rule. Employers in State Plan States should contact their State OSHA Offices for more information regarding applicable requirements. (See the list of contacts in "States with Approved Plans" at the back of this booklet.)

The HCS requires information to be prepared and transmitted regarding all hazardous chemicals. The HCS covers both physical hazards (such as flammability) and health hazards (such as irritation, lung damage, and cancer.) Most chemicals used in the workplace have some hazard potential, and thus will be covered by the rule.

One difference between this rule and many others adopted by OSHA is that this one is performance-oriented. That means you have the flexibility to adapt the rule to the needs of your workplace, rather than having to follow specific rigid requirements. It also means that you have to exercise more judgment to implement an appropriate and effective program.

The standard's design is simple. Chemical manufacturers and importers must evaluate the hazards of the chemicals they produce or import. Using that information, they must then prepare labels for containers and more detailed technical bulletins called material safety data sheets (MSDSs).

Chemical manufacturers, importers, and distributors of hazardous chemicals are all required to provide the appropriate labels and material safety data sheets to the employers to whom they ship the

chemicals. The information must be provided automatically. Every container of hazardous chemicals you receive must be labeled, tagged, or marked with the required information. Your suppliers also must send you a properly completed MSDS at the time of the first shipment of the chemicals, and with the next shipment after the MSDS is updated with new and significant information about the hazards.

You can rely on the information received from your suppliers. You have no independent duty to analyze the chemical or evaluate the hazards of it.

Employers that "use" hazardous chemicals must have a program to ensure the information is provided to exposed employees. "Use" means to package, handle, react, or transfer. This is an intentionally broad scope, and includes any situation where a chemical is present in such a way that employees may be exposed under normal conditions of use or in a foreseeable emergency.

The requirements of the rule that deal specifically with the hazard communication program are found in the standard in paragraphs (e), written hazard communication programs; (f), labels and other forms of warning; (g), material safety data sheets; and (h), employee information and training. The requirements of these paragraphs should be the focus of your attention. Concentrate on becoming familiar with them, using paragraphs (b), scope and application, and (c), definitions, as references when needed to help explain the provisions.

There are two types of work operations where coverage of the rule is limited. These are laboratories and operations where chemicals are only handled in sealed containers (e.g., a warehouse). The limited provisions for these workplaces can be found in paragraph (b), scope and application. Basically, employers having these types of work operations need only keep labels on containers as they are received, maintain material safety data sheets that are received and give employees access to them, and provide information and training for employees. Employers do not have to have written hazard communication programs and lists of chemicals for these types of operations.

The limited coverage of laboratories and sealed container operations addresses the obligation of an employer to the workers in the

operations involved, and does not affect the employer's duties as a distributor of chemicals. For example, a distributor may have warehouse operations where employees would be protected under the limited sealed container provisions. In this situation, requirements for obtaining and maintaining MSDSs are limited to providing access to those received with containers while the substance is in the workplace, and requesting MSDSs when employees request access for those not received with the containers. However, as a distributor of hazardous chemicals, that employer will still have responsibility for providing MSDSs to downstream customers at the time of the first shipment and when the MSDS is updated. Therefore, although they may not be required for the employees in the work operation, the distributor may, nevertheless, have to have MSDSs to satisfy other requirements of the rule.

Hazard communication will be a continuing program in your facility. Compliance with HCS is not a "one shot deal." In order to have a successful program, you must assign responsibility for both the initial and ongoing activities that have to be undertaken to comply with the rule. In some cases, these activities may be part of current job assignments. For example, Site Supervisors are frequently responsible for on-the-job training sessions. Early identification of the responsible employees and their involvement in developing your action plan will result in a more effective program design. Involving affected employees also will enhance the evaluation of the effectiveness of your program.

For any safety and health program, success depends on commitment at every level of the organization. This is particularly true for hazard communication, where success requires a change in behavior. This will occur only if employers understand the program and are committed to its success, and if the people presenting the information motivate employees.

The standard requires a list of hazardous chemicals in the workplace as part of the written hazard communication program. The list will eventually serve as an inventory of everything for which you must maintain an MSDS. At this point, however, preparing the list will help you complete the rest of the program since it will give you some idea of the scope of the program required for compliance in your facility.

The best way to prepare a comprehensive list is to survey the workplace. Purchasing records also may help, and certainly employers should establish procedures to ensure that in the future purchasing procedures result in MSDSs being received before using a material in the workplace.

The broadest possible perspective should be taken when doing the survey. Sometimes people think of "chemicals" as being only liquids in containers. The HCS covers chemicals in all physical forms—liquids, solids, gases, vapors, fumes, and mists—whether they are "contained" or not. The hazardous nature of the chemical and the potential for exposure are the factors that determine whether a chemical is covered. If it's not hazardous, it's not covered. If there is no potential for exposure, (e.g., the chemical is inextricably bound and cannot be released), the rule does not cover the chemical.

Look around. Identify the chemicals in containers, including pipes, but also think about chemicals generated in the work operations. For example, welding fumes, dusts, and exhaust fumes are all sources of chemical exposures. Read labels provided by the suppliers on hazard information. Make a list of all chemicals in the workplace that are potentially hazardous. For your own information and planning, you also may want to note on the list the location(s) of the products within the workplace, and an indication of the hazards as found on the label. This will help you as you prepare the rest of your program.

Paragraph (b), scope and application, includes exemptions for various chemicals or workplace situations. After compiling the complete list of chemicals, you should review paragraph (b) to determine if any of the items can be eliminated from the list because they are exempted materials. For example, food, drugs, and cosmetics brought into the workplace for employee consumption are exempt; rubbing alcohol in the first aid kit would not be covered.

Once you have compiled as complete a list as possible of the potentially hazardous chemicals in the workplace, the next step is to determine if you have received material safety data sheets for all of them. Check your files against the inventory you have just compiled. If any are missing, contact your supplier and request one. It is a good idea to document these requests, either by copy of a letter or a note regarding telephone conversations. If you have MSDSs for chemicals that are not on your list, figure out why. Maybe you don't use the chemical anymore. Or maybe you missed it in your survey. Some suppliers do provide MSDSs for products that are not hazardous. These do not have to be maintained by you. If you have questions regarding the hazard status of a chemical, contact the manufacturer, distributor, or importer.

You should not allow employees to use any chemicals for which you have not received an MSDS. The MSDS provides information you need to ensure you have implemented proper protective measures for exposure.

The HCS requires all workplaces where employees are exposed to hazardous chemicals to have a written plan that describes how that facility will implement the standard. Preparation of the plan is not just a paper exercise—all of the elements must be implemented in the workplace to comply with the rule. See paragraph (e) of the standard for the specific requirements regarding written hazard communication programs. The only work operations that do not have to comply with the written plan requirements are laboratories and work operations where employees only handle chemicals in sealed containers. See paragraph (b), scope and application, for the specific requirements for these two types of workplaces.

The plan does not have to be lengthy or complicated. It is intended to be a blueprint for implementing your program—an assurance that all aspects of the requirements have been addressed.

Many trade associations and other professional groups have provided sample programs and other assistance materials to affect employers. These have been very helpful to many employers since they tend to be tailored to the particular industry involved. You may wish to investigate whether your industry trade groups have developed such materials.

Although such general guidance may be helpful, you must remember that the written program has to reflect what you are doing in your workplace. Therefore, if you use a generic program, you must adapt it to address the facility it covers.

For example, the written plan must list the chemicals present at the site and indicate where written materials will be made available to employees. It also may indicate who is responsible for the various aspects of the program in your facility.

If OSHA inspects your workplace for compliance with the HCS, the OSHA compliance officer will ask to see your written plan at the outset of the inspection. In general, the following items will be considered in evaluating your program.

The written program must describe how the requirements for labels and other forms of warning, materials safety data sheets, and employee information and training, are going to be met in your facility. The following discussion provides the type of information compliance officers will be looking for to decide whether you have properly addressed these elements of the hazard communication program.

Labels and Other Forms of Warning

In-plant containers of hazardous chemicals must be labeled, tagged, or marked with the identity of the material and appropriate hazard warnings. Chemical manufacturers, importers, and distributors must ensure that every container of hazardous chemicals they ship is appropriately labeled with such information and with the name and address of the producer or other responsible party. Employers purchasing chemicals can rely on the labels provided by their suppliers. If the material is subsequently transferred by the employer from a labeled container to another container, the employer will have to label that container, unless it is subject to the portable container exemption. See paragraph (f) for specific labeling requirements.

The primary information to be obtained from an OSHA-required label is the identity for the material and appropriate hazard warnings. The identity is any term which appears on the label, the MSDS, and the list of chemicals, and thus links these three sources of information. The identity used by the supplier may be a common or trade name ("Black Magic Formula"), or a chemical name (1, 1, 1 - trichloroethane). The hazard warning is a brief statement of the hazardous effects of the chemical ("flammable," "causes lung damage"). Labels frequently contain other information, such as precautionary measures ("do not use near open flame") but this information is provided voluntarily and is not required by the rule. Labels must be legible and prominently displayed. There are no specific requirements for size or color or any specified test.

With these requirements in mind, the compliance officer will be looking for the following types of information to ensure that labeling is properly implemented in your facility:

- Designation of person(s) responsible for ensuring labeling of in-plant containers;
- Designation of person(s) responsible for ensuring labeling of any shipped container;
- Description of labeling system(s) used;
- Description of written alternatives to labeling of in-plant containers (if used); and,
- Procedures to review and update label information when necessary.

Employers that are purchasing and using hazardous chemicals—rather than producing or distributing them—will primarily be concerned with ensuring that every purchased container is labeled. If materials are transferred into other containers, the employer must ensure that these are labeled as well, unless they fall under the portable container exemption (paragraph f(7)). In terms of labeling systems, you can choose to use the labels provided by your suppliers on the containers. These will generally be verbal text labels, and do not usually include numerical rating systems or symbols that require special training. The most important thing to remember is that this is a continuing duty—all in-plant containers of hazardous chemicals must always be labeled. Therefore, it is important to designate someone to be responsible for ensuring that the labels are maintained as required on the containers in your facility and that newly purchased materials are checked for labels prior to use.

Material Safety Data Sheets

Chemical manufacturers and importers are required to obtain or develop a material safety data sheet for each hazardous chemical they produce or import. Distributors are responsible for ensuring that their customers are provided a copy of these MSDSs. Employers must have an MSDS for each hazardous chemical which they use. Employers may rely on the information received from their suppliers. The specific requirements for material safety data sheets are in paragraph (g) of the standard.

There is no specific format for the MSDS under the rule, although there are specific information requirements. OSHA has developed a nonmandatory format, OSHA Form 174, which may be used by chemical manufacturers and importers to comply with the rule. The MSDS must be in English. You are entitled to receive from your supplier a data sheet which includes all of the information required under the rule. If you do not receive one automatically, you should request one. If you receive one that is obviously inadequate, with, for example, blank spaces that are not completed, you should request an appropriately completed one. If your request for a data sheet or for a corrected data sheet does not produce the information needed, you should contact your local OSHA Area Office for assistance in obtaining the MSDS.

Under the rule, the role of MSDSs is to provide detailed information on each hazardous chemical, including its potential hazardous effects, its physical and chemical characteristics, and recommendations for appropriate protective measures. This information should be useful to you as the employer responsible for designing protective programs, as well as to the workers. If you are not familiar with material safety data sheets and with chemical terminology, you may need to learn to use them yourself. A glossary of MSDS terms may be helpful in this regard. Generally speaking, most employers using hazardous chemicals will primarily be concerned with MSDS information regarding hazardous effects and recommended protective measures. Focus on the sections of the MSDS that are applicable to your situation.

MSDSs must be readily accessible to employees when they are in their work areas during their workshifts. This may be accomplished in many different ways. You must decide what is appropriate for your particular workplace. Some employers keep the MSDSs in a binder in a central location (e.g., in the pickup truck on a construction site.) Others, particularly in workplaces with large numbers of chemicals, computerize the information and provide access through terminals. As long as employees can get the information when they need it, any approach may be used. The employees must have access to the MSDSs themselves—simply having a system where the information can be read to them over the phone is permitted only under the mobile worksite provision, paragraph (g)(9), when employees must travel between workplaces during the shift. In this situation, they have access to the MSDSs prior to leaving the primary worksite, and when they return, so the telephone system is simply an emergency arrangement.

In order to ensure that you have a current MSDS for each chemical in the plant as required, and that you provide employee access, the compliance officers will be looking for the following types of information in your written program:

- Designation of person(s) responsible for obtaining and maintaining the MSDSs;
- How such sheets are to be maintained in the workplace (e.g., in notebooks in the work area(s) or in a computer with terminal access), and how employees can obtain access to them when they are in their work area during the workshift;

- Procedures to follow when the MSDS is not received at the time of the first shipment;
- For producers, procedures to update the MSDS when new and significant health information is found; and,
- Description of alternatives to actual data sheets in the workplace, if used.

For employers using hazardous chemicals, the most important aspect of the written program in terms of MSDSs is to ensure that someone is responsible for obtaining and maintaining the MSDSs for every hazardous chemical in the workplace. The list of hazardous chemicals required to be maintained as part of the written program will serve as an inventory. As new chemicals are purchased, the list should be updated. Many companies have found it convenient to include on their purchase order the name and address of the person designated in their company to receive MSDSs.

Employee Information and Training

Each employee who may be "exposed" to hazardous chemicals when working must be provided information and be trained prior to initial assignment to work with a hazardous chemical, and whenever the hazard changes. "Exposure" or "exposed" under the rule means that an employee is subjected to a hazardous chemical in the course of employment through any route of entry (inhalation, ingestion, skin contact, or absorption) and includes potential (e.g., accidental or possible) exposure. See paragraph (h) of the standard for specific requirements. Information and training may be done either by individual chemical, or by categories of hazards (such as flammability or carcinogenicity). If there are only a few chemicals in the workplace, then you may want to discuss each one individually. Where there are a large number of chemicals, or the chemicals change frequently, you will probably want to train generally based on the hazard categories (e.g., flammable liquids, corrosive materials, carcinogens). Employees will have access to the substance-specific information on the labels and MSDSs. Employers must ensure, however, that employees are made aware of which hazard category a chemical falls within.

Information and training are a critical part of the hazard communication program. Workers obtain information regarding hazards and

protective measures through written labels and material safety data sheets. It is through effective information and training, however, that workers will learn to read and understand such information, determine how to acquire and use it in their own workplace, and understand the risks of exposure to the chemical in their workplaces as well as the ways to protect themselves. A properly conducted training program will ensure comprehension and understanding. It is not sufficient to either just read material to the workers or simply hand them material to read. You want to create a climate where workers feel free to ask questions. This will help you to ensure that the information is understood. You must always remember that the underlying purpose of the HCS is to reduce the incidence of chemical source illnesses and injuries. This will be accomplished by modifying behavior through the provision of hazard information and information about protective measures. If your program works, you and your workers will better understand the chemical hazards within the workplace. The procedures you establish, regarding, for example, purchasing, storage, and handling of these chemicals will improve, and thereby reduce the risks posed to employees exposed to the chemical hazards involved. Furthermore, your workers' comprehension also will be increased, and proper work practices will be followed in your workplace.

If you are going to do the training yourself, you will have to understand the material and be prepared to motivate the workers to learn. This is not always an easy task, but the benefits are worth the effort. More information regarding appropriate training can be found in *Training Requirements in OSHA Standards and Training Guidelines (OSHA 2254)*, which contains voluntary training guidelines prepared by OSHA's Training Institute. A copy of this document is available from the Superintendent of Documents, Government Printing Office, P.O. Box 371954, Pittsburgh, PA 15250-7954; (202) 512-1800.

When reviewing your written program regarding information and training, consider the following items:

- Designation of person(s) responsible for conducting training;
- Format of the program used (audiovisuals, class room instruction);
- Elements of the training programs (should be consistent with the elements in paragraph (h) of the HCS); and,

- Procedure to train new employees at the time of their initial assignment to work with a hazardous chemical, and to train employees when introducing a new hazard into the workplace.

The written program should provide enough details about the employer's plans in this area to assess whether or not a good faith effort is being made to train employees. OSHA does not expect that every workers will be able to recite all the information about each chemical in the workplace. In general, the most important aspects of training under the HCS are to ensure that employees are aware that they are exposed to hazardous chemicals, that they know how to read and use labels and material safety data sheets, and that, as a consequence of learning this information, they are following the appropriate protective measures established by the employer. OSHA compliance officers will be talking to employees to determine if they have received training, if they know they are exposed to hazardous chemicals, and if they know where to obtain substance specific information on labels and MSDSs.

The rule does not require employers to maintain records of employee training, but many employers choose to do so. This may help you monitor your own program to ensure that you have trained all employees appropriately. If you already have a training program, you may simply have to supplement it with whatever additional information is required under the HCS. For example, construction employers that are already in compliance with the construction training standard (29 CFR 1926.21) will have little extra training to do.

An employer can provide employees information and training through whatever means found appropriate and protective. Although there would always have to be some training on site (such as informing employees of the location and availability of the written program and MSDSs), employee training may be satisfied in part by general training about the requirements of the HCS which is provided by, for example, trade associations, unions, colleges, and professional schools. In addition, previous training, education, and experience of a worker may relieve the employer of some of the burdens of information and training that worker. Regardless of the method relied upon, however, the employer is always ultimately responsible for ensuring that employees are adequately trained. If the compliance

officer finds that the training is deficient, the employer will be cited for the deficiency regardless of who actually provided the training on behalf of the employer.

In addition to these specific items, compliance officers also will be asking the following questions in assessing the adequacy of the program:

- Does a list of the hazardous chemicals exist in each work area or at a central location?
- Are methods the employer will use to inform employees of the hazards of non-routine tasks outlined?
- Are employees informed of the hazards associated with chemicals contained in unlabeled pipes in their work areas?
- On multi-employer worksites, has the employer provided other employers with information about labeling systems and precautionary measures where the other employers have employees exposed to the initial employer's chemicals?
- Is the written program made available to employees and their designated representatives?

If your program adequately addresses the means of communicating information to employees in your workplace and provides answers to the basic questions outlined above, it will comply with the rule.

16 Checklist for Compliance

The following checklist will help to ensure you comply with the rule:

- Obtained a copy of the rule.
- Read and understood the requirements.
- Assigned responsibility for tasks.
- Prepared an inventory of chemicals.
- Ensured containers are labeled.
- Obtained MSDS for each chemical.
- Prepared written program.
- Made MSDSs available to workers.
- Conducted training of workers.
- Established procedures to maintain current program.
- Established procedures to evaluate effectiveness.

Hazard Communication Program

_____ Area Technology Center

Date Prepared:_____

Purpose

The purpose of the _____ ATC Hazard Communication Program is to ensure that:

1. Hazardous substances present in the facility are properly identified and labeled;

2. Faculty, staff, and students have access to information on the hazards of chemicals used in ATC program and work areas;

3. Faculty, staff, and students are provided with information on how to prevent injuries or illness due to exposure to chemicals used in ATC program and work areas;

4. Identification by job title the individuals who have the responsibility for maintaining the program, maintaining MSDS sheets, and conducting training.

Location of Program

The Hazard Communication Program shall be available to all faculty, staff, and students for review and a copy shall be located in the following areas:

1.

2.

3.

4.

Authority

The requirement to have a written Hazard Communication Program is contained in OSHA Standards at 29 CFR 1910.1200.

Hazard Determination

A "hazardous substance" is a physical or health hazard that is listed as such in either of the following:

1. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration; or

2. *Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment* (latest edition), American Conference of Governmental Industrial Hygienists (ACGIH).

A "hazardous substance" is regarded as a carcinogen or potential carcinogen if it is identified as such by any of the following.

1. National Toxicology Program (NTP), *Annual Report on Carcinogens* (latest edition).

2. International Agency for Research on Cancer (IARC) *Monographs* (latest edition).

3. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration.

Manufacturers, importers, and distributors will be relied upon to perform the appropriate hazard determination for the substances they produce or sell.

The following materials are not covered by the Hazard Communication Program.

1. Any hazardous waste as defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC 6901 et seq.) when subject to regulations issued under that act by the Environmental Protection Agency.

2. Tobacco or tobacco products.

3. Wood or wood products. Wood dust is a recognized health hazard, with exposure limits recommended by the American Conference of Governmental Industrial Hygienists to control employee exposure to the substance. Wood dust is to be considered a hazardous chemical and is subject to the requirements of the Hazard Communication Program including Material Safety Data Sheets and training.

    a) In those program areas where students are exposed to wood dust, they are to receive the same exposure control training and information as faculty.

4. Consumer products (including pens, pencils, adhesive tape) used in the work place under typical consumer usage. However, those items that can cause a medical reaction or health problems if used incorrectly shall have a MSDS available in the program and/or work area.

5. Articles (i.e. plastic chairs).

6. Foods, drugs, or cosmetics intended for personal consumption by employees while in the work place.

7. Foods, drugs, cosmetics or alcoholic beverages in retail stores packaged for retail sale.

8. Any drug in solid form used for direct administration to the patient (i.e. tablets or pills).

Application

The Hazard Communication Program applies to the use of any hazardous substance in program areas, program laboratories and shops, by management, and by maintenance personnel, which may expose employees and students under normal conditions of use or in a foreseeable emergency.

Responsibility for Compliance

The administration of this program shall be the responsibility of _____. The administrative responsibilities of this individual/position shall include the following.

1. Identification of the program and administrative areas to be included in the Hazard Communication Program. All identified areas shall be required to maintain MSDS.

2. Development and maintenance of a hazardous substance master inventory.

3. Coordination and supervision of employee training.

4. Coordination and supervision of the ATC's container labeling program.

5. Coordination of any necessary exposure monitoring.

6. Coordination and supervision of required recordkeeping.

7. Periodic evaluation of the overall program.

Instructors are responsible for insuring students follow all safe work practices and use all proper precautions required by the program and individual MSDS.

Hazard Materials Inventory

1. Each faculty member and employee shall responsible for compiling, maintaining, and updating, when necessary, a master list of hazardous substances used in their areas of responsibility. The inventory list shall be identified by a reference that is appropriate to the MSDS, product location, storage area, quantity, and MSDS information. Hazardous substances shall be listed alphabetically. Substances which are not in containers shall also be included on the inventory list, e.g., welding fumes, carbon monoxide from a fork lift, etc.

2. Appendix One contains the Hazard Chemical and Material Inventory.

3. Each ATC Principal shall maintain a master inventory of all hazardous materials used in the facility.

Labeling

_____ shall be responsible for evaluating labels on incoming containers. Each label must contain the following information:

1. Identity of the substance;

2. Appropriate hazard warning; and

3. Name and address of the manufacturer.

Inappropriate or Missing Labels

1. If a label is not appropriate or is missing, _____ shall notify the supplier that the label is not adequate and request a new label.

2. _____ shall send a second request to the supplier if the correct label is not received within 30 days.

3. _____ shall be responsible for preparing an appropriate label if one is not supplied by the manufacturer within the second 30 days.

4. A container will not be released for use until an appropriate label is affixed to the container.

5. Labels shall be removed if they are incorrect.

6. All users of hazardous materials (faculty, maintenance, etc.) are responsible for ensuring that all containers used in his/her area of responsibility are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.

7. Unlabeled portable containers, such as pails and buckets, should be used by one employee and emptied at the end of each class period, or for maintenance personnel, at the end of the workday.

8. If a secondary container is to be used by more than one person, or over more than one day or class period, the responsible individual shall label the container with either a copy of the original label or with a hazardous material identification system label. One type of labeling system is the Hazardous Material Identification System (HMIS) for hazardous materials.

Material Data Safety Sheets

1. MSDS shall be available to all faculty, staff, and students on all hazardous chemicals and materials to which there is potential or actual exposure. Each instructor shall be responsible for maintaining the MSDS for his/her program areas. Maintenance personal personnel shall be responsible for maintaining the MSDS for the chemicals and materials used.

2. If the MSDS is not available, the chemical or materials shall not be used.

3. Each ATC Principal shall maintain a master file of all MSDS for the facility.

4. Each staff member responsible for MSDS shall update as necessary for the appropriate program, work area, etc., as well as, the ATCs master list.

5. Faculty, staff, and students shall have access to MSDS during the normal instructional and work day. The documents shall be maintained in a notebook labeled as containing MSDS. The location of the notebook shall also be identified. This is also known as a "Right to Know Center."

Employee and Student Training

Prior to starting work with hazardous substances, each employee and student shall attend a hazard communication training session where they shall receive information on the following topics.

1. Policies and procedures related to the Hazard Communication Program.

2. Location of the written Hazard Communication Program.

3. How to read and interpret an MSDS.

4. Location of MSDS.

5. Physical and health hazards of hazardous substances in their program or work area.

6. Methods and observation techniques to determine the presence or release of hazardous chemicals.

7. Work practices that may result in exposure.

8. How to prevent or reduce exposure to hazardous substances.

9. Personal protective equipment.

10. Procedures to follow if exposure occurs.

11. Emergency response procedures for hazardous chemical spills.

Upon completion of the training program, each employee and student shall sign a form documenting that he/she has received the training. This form shall be part of the ATC's training documentation.

Whenever a new employee is transferred or hired, or a new student enters the program, he/she shall be provided training regarding the Hazard Communication Program. The training session shall be conducted by _____ before the start of his/her employment if possible.

_____ shall be responsible for identifying and listing any non-routine hazardous task performed at the ATC. _____ shall conduct training on the specific hazards of the job and the appropriate personal protective equipment and safety precautions and procedures.

When a new substance is added to the inventory list, the appropriate faculty or employee shall be responsible for reviewing the MSDS for potential health effects. If the product presents a new health hazard (causes health effects unlike those covered in the training session) the appropriate instructor or employee shall be responsible for notifying all affected instructors, staff, and students about the new health effects which result from exposure to the new substance.

Information To and From Contractors

_____ is responsible for providing outside contractors with the following information.

1. Hazardous chemicals to which they may be exposed as a result of working in this facility.

2. Suggestions for appropriate protective measures.

3. Labeling system used in the facility.

Contractors that are potentially exposed to hazardous chemicals present at the facility shall not be allowed to begin work until they have been provided information concerning these hazards and have signed a form to document this exchange. This form is contained in Appendix Two.

_____ is responsible for obtaining information from contractors on all hazardous substances to which faculty, staff, and students may be exposed as a result of the contractor's work at the facility. _____ shall notify affected instructors, staff, and students about the health affects that may result from exposure to each substance. This form is contained in Appendix Two.

Personnel Policies

When a faculty member, staff member, and/or student is not following safety and health rules regarding working with a hazardous chemical or material, disciplinary action shall be taken.

Documentation

1. All inactive MSDS shall be maintained by the ATC in a separate file, even if use of the substance has been discontinued.

2. If a faculty member, staff member, or student is exposure to a particular hazardous chemical occurs, the MSDS for that product will become part of the employee's medical records. These medical records must be kept for 30 years.

3. All inactive master inventory lists shall also be maintained.

Program Evaluation

_____ shall conduct an evaluation of the Hazard Communication Program annually. The individual responsible for the items identified for improvement shall be notified in writing. It is expected that action shall be taken to correct the item within five working days.

The Hazard Communication Program shall also be included in the annual safety inspection conducted by the Cabinet's Safety Section.

Appendices: Hazardous Chemical and Material Inventory
Information To and From Contractors

Hazard Chemical and Material Inventory

Name of Facility:
Program or Department:
Date Inventory Completed:
Inventory Completed By:
(Complete an Inventory for Each Program and Department in the Facility)

Chemical Product (Name on Label and Generic if Known)	Chemical Product (Name on Label and Generic if Known)

Hazard Communication Program
Information from Contractor

ATC:_____

ATC Contract:_____

Contractor Name:_____

Contractor Address:_____

_____

_____

Phone Number:_____

FAX Number:_____

Project/Work Location:_____

Begin Date:_____ End Date:_____

List of all hazardous chemicals/materials that are to be brought into the ATC during the project. Describe the following for each chemical/material:

- How the chemical/material is to be used;
- Where the chemical/materials is to be used;
- Location of appropriate Material Data Safety Sheet;
- How and where the materials will be stored;
- Labeling system used to identify the chemicals/materials.

_____
_____
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_____
_____

I _____ (name of ATC contact) do hereby acknowledge receipt of the hazardous materials list from the contractor.

Date:_____

Original-Maintained by the ATC Principal
Copy-Maintained by the contractor

Hazard Communication Program
Information to Contractor

ATC:_____

ATC Contact:_____

Contractor Name:_____

Contractor Address:_____

_____

_____

Contractor Phone Number:_____

Contractor FAX Number:_____

Project/Work Location:_____

Begin Date:_____ End Date:_____

List of all hazardous chemicals/materials that are used in the project/work area which may create an actual or potential exposure . Describe the following for each chemical/material in the project/work area:

- How the chemical/material is to be used;
- Where the chemical/materials is to be used;
- Location of appropriate Material Data Safety Sheet;
- How and where the materials will be stored;
- Labeling system used to identify the chemicals/materials.

_____
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_____

I _____ (name of contractor) do hereby acknowledge receipt of the hazardous materials list from the ATC.

Date:_____

Original-Maintained by the contractor
Copy-Maintained by the ATC Principal

Hazard Communication Program

_____(Name of Facility)_____

Date Prepared:_____

Purpose

The purpose of the _____(Name of Facility)_____ Hazard Communication Program is to ensure that:

1. Hazardous substances present in the facility are properly identified and labeled;

2. Employees, customers, vendors, and contractors have access to information on the hazards of chemicals used in the facility;

3. Employees, customers, vendors, and contractors are provided with information on how to prevent injuries or illness due to exposure to chemicals used in the facility; and

4. Identification by job title the individuals who have the responsibility for maintaining the program, maintaining MSDS sheets, and conducting training.

Location of Program

The Hazard Communication Program shall be available to all employees, customers, vendors, and contractors for review and a copy of the program shall be located in the following areas:

1.

2.

3.

4.

Authority

The requirement to have a written Hazard Communication Program is contained in OSHA Standards at 29 CFR 1910.1200.

Hazard Determination

A "hazardous substance" is a physical or health hazard that is listed as such in either:

1. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration; or

2. *Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment* (latest edition), American Conference of Governmental Industrial Hygienists (ACGIH).

A "hazardous substance" is regarded as a carcinogen or potential carcinogen if it is identified as such by any of the following.

1. National Toxicology Program (NTP), *Annual Report on Carcinogens* (latest edition).

2. International Agency for Research on Cancer (IARC) *Monographs* (latest edition).

3. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration.

Manufacturers, importers, and distributors will be relied upon to perform the appropriate hazard determination for the substances they produce or sell.

The following materials are not covered by the Hazard Communication Program.

1. Any hazardous waste as defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC 6901 et seq.) when subject to regulations issued under that act by the Environmental Protection Agency.

2. Tobacco or tobacco products.

3. Wood or wood products. Wood dust is a recognized health hazard, with exposure limits recommended by the American Conference of Governmental Industrial Hygienists to control employee exposure to the substance. Wood dust is to be considered a hazardous chemical and is subject to the requirements of the Hazard Communication Program including Material Safety Data Sheets and training.

    a) In those work areas where employees are exposed to wood dust, they are to receive the exposure control training and information.

4. Consumer products (including pens, pencils, adhesive tape) used in the work place under typical consumer usage. However, those items that can cause a medical reaction or health problems if used incorrectly shall have a MSDS available in the program and/or work area.

5. Articles (i.e. plastic chairs).

6. Foods, drugs, or cosmetics intended for personal consumption by employees while in the work place.

7. Foods, drugs, cosmetics or alcoholic beverages in retail stores packaged for retail sale.

8. Any drug in solid form used for direct administration to the patient (i.e. tablets or pills).

Application

The Hazard Communication Program applies to the use of any hazardous substance in any area of the facility by employees, customers, vendors, or maintenance personnel, which may expose anyone in the facility under normal conditions of use or in a foreseeable emergency.

Responsibility for Compliance

The administration of this program shall be the responsibility of _____(Title)_____.

The administrative responsibilities of this individual/position shall include the following.

1. Identification of the work, storage, and administrative areas to be included in the Hazard Communication Program. All identified areas shall be required to maintain MSDS.

2. Development and maintenance of a hazardous substance master inventory.

3. Coordination and supervision of employee training.

4. Coordination and supervision of the container labeling program.

5. Coordination of any necessary exposure monitoring.

6. Coordination and supervision of required recordkeeping.

7. Periodic evaluation of the overall program.

Supervisors are responsible for insuring employees follow all safe work practices and use all proper precautions required by the program and individual MSDS.

Hazard Materials Inventory

1. Facility management shall be responsible for compiling, maintaining, and updating, when necessary, a master list of hazardous substances used in the facility. The inventory list shall be identified by a reference that is appropriate to the product and MSDS information. Hazardous substances shall be listed alphabetically. Substances which are not in containers shall also be included on the inventory list, e.g., welding fumes, carbon monoxide from a fork lift, etc.

2. Appendix One contains the Hazard Chemical and Material Inventory.

Labeling

_____(Title)_____ shall be responsible for evaluating labels on incoming containers.

Each label must contain the following information:

1. Identity of the substance;

2. Appropriate hazard warning; and

3. Name and address of the manufacturer.

Inappropriate or Missing Labels

1. If a label is not appropriate or is missing, _____(Title)_____ shall notify the supplier that the label is not adequate and request a new label.

2. ____(Title)_____ shall send a second request to the supplier if the correct label is not received within 30 days.

3. ___(Title)_____ shall be responsible for preparing an appropriate label if one is not supplied by the manufacturer within the second 30 days.

4. A container will not be released for use until an appropriate label is affixed to the container.

5. Labels shall be removed if they are incorrect.

6. All users of hazardous materials are responsible for ensuring that all containers used in his/her area of responsibility are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.

7. Unlabeled portable containers, such as pails and buckets, should be used by one employee and emptied at the end of each workday, or for maintenance personnel, at the end of the work shift.

8. If a secondary container is to be used by more than one person, or over more than one day, the responsible individual shall label the container with either a copy of the original label, or with a hazardous material identification system label. One type of labeling system is the Hazardous Material Identification System (HMIS) for hazardous materials.

Material Data Safety Sheets

1. MSDS shall be available to all employees, customers, vendors, maintenance personnel and contractors on all hazardous chemicals and materials to which there is potential or actual exposure. Each facility manager shall be responsible for maintaining the MSDS for his/her facility. Maintenance personal personnel shall be responsible for maintaining the MSDS for the chemicals and materials used.

2. If the MSDS is not available, the chemical or materials shall not be used.

3. Employees, customers, vendors, maintenance personnel and contractors shall have access to MSDS during the work day. The documents shall be maintained in a notebook labeled as containing MSDS. The location of the notebook shall also be identified. This is also known as a "Right to Know Center."

Employee Training

Prior to starting work with hazardous substances, each employee shall attend a hazard communication training session where they shall receive information on the following topics.

1. Policies and procedures related to the Hazard Communication Program.
2. Location of the written Hazard Communication Program.
3. How to read and interpret an MSDS.
4. Location of MSDS Right To Know Centers.
5. Physical and health hazards of hazardous substances in the facility.
6. Methods and observation techniques to determine the presence or release of hazardous chemicals.
7. Work practices that may result in exposure.
8. How to prevent or reduce exposure to hazardous substances.
9. Personal protective equipment.
10. Procedures to follow if exposure occurs.
11. Emergency response procedures for hazardous chemical spills.

Upon completion of the training program, each employee shall sign a form documenting that he/she has received the training. This form shall be part of the facility's training documentation.

Whenever a new employee is transferred or hired, he/she shall be provided training regarding the facility's Hazard Communication Program. The training session shall be conducted by _____(Title)_____ before the start of his/her employment if possible.

_____(Title)_____ shall be responsible for identifying and listing any non-routine hazardous task performed in the facility. ____(Title)_____ shall conduct training on the specific hazards and the appropriate personal protective equipment and safety precautions and procedures.

When a new substance is added to the inventory list, the appropriate employee shall be responsible for reviewing the MSDS for potential health effects. If the product presents a new health hazard (causes health effects unlike those covered in the training session) the appropriate employee shall be responsible for notifying all affected staff about the new health effects which result from exposure to the new substance.

Information To and From Contractors

_____(Title)_____ is responsible for providing outside contractors with the following information:

1. Hazardous chemicals to which they may be exposed as a result of working in this facility;

2. Suggestions for appropriate protective measures;

3. Labeling system used in the facility.

Contractors that are potentially exposed to hazardous chemicals present at the facility shall not be allowed to begin work until they have been provided information concerning these hazards and have signed a form to document this exchange. This form is contained in Appendix Two.

_____(Title)_____ is responsible for obtaining information from contractors on all hazardous substances to which anyone in the facility may be exposed as a result of the contractor's work at the facility. _____(Title)_____ shall notify affected instructors, staff, and students about the health affects that may result from exposure to each substance. This form is contained in Appendix Two.

Personnel Policies

When an employee is not following safety and health rules regarding working with a hazardous chemical or material, disciplinary action shall be taken.

Documentation

1. All inactive MSDS shall be maintained by the facility in a separate file, even if use of the substance has been discontinued.

2. If an employee, customer, maintenance personnel, vendors or contractors is exposed to a particular hazardous chemical occurs, the MSDS for that product will become part of the employee's medical records. These medical records must be kept for 30 years.

3. All inactive master inventory lists shall also be maintained.

Program Evaluation

_____(Title)_____ shall conduct an evaluation of the Hazard Communication Program annually. The individual responsible for the items identified for improvement shall be notified in writing. It is expected that action shall be taken to correct the item within five working days.

The Hazard Communication Program shall also be included in the safety inspection conducted by the Cabinet's Safety Section.

Appendices: Hazardous Chemical and Material Inventory
Information To and From Contractors

Hazard Chemical and Material Inventory

Name of Facility:
Date Inventory Completed:
Inventory Completed By:

Chemical Product (Name on Label and Generic if Known)	Chemical Product (Name on Label and Generic if Known)

Hazard Communication Program
Information from Contractor

Facility:_____

Facility Contract:_____

Contractor Name:_____

Contractor Address:_____

_____

_____

Phone Number:_____

FAX Number:_____

Project/Work Location:_____

Begin Date:_____ End Date:_____

List of all hazardous chemicals/materials that are to be brought into the facility during the project. Describe the following for each chemical/material:

- How the chemical/material is to be used;
- Where the chemical/materials is to be used;
- Location of appropriate Material Data Safety Sheet;
- How and where the materials will be stored;
- Labeling system used to identify the chemicals/materials.

_____
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I _____ (name of facility contact) do hereby acknowledge receipt of the hazardous materials list from the contractor.

Date:_____

Original-Maintained by the facility manager
Copy-Maintained by the contractor

Hazard Communication Program
Information to Contractor

Facility:_____

Facility Contact:_____

Contractor Name:_____

Contractor Address:_____

_____

_____

Contractor Phone Number:_____

Contractor FAX Number:_____

Project/Work Location:_____

Begin Date:_____ End Date:_____

List of all hazardous chemicals/materials that are used in the project/work area which may create an actual or potential exposure . Describe the following for each chemical/material in the project/work area:

- How the chemical/material is to be used;
- Where the chemical/materials is to be used;
- Location of appropriate Material Data Safety Sheet;
- How and where the materials will be stored;
- Labeling system used to identify the chemicals/materials.

_____
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_____

I _____ (name of contractor) do hereby acknowledge receipt of the hazardous materials list from the facility.

Date:_____

Original-Maintained by the contractor
Copy-Maintained by the facility manager

Hazard Communication Program

___(Name of Facility)_____ Youth Development Center

Date Prepared:_____

Purpose

The purpose of the __(Name of Facility)_____ YDC Hazard Communication Program is to ensure that:

1. Hazardous substances present in the facility are properly identified and labeled;

2. Faculty, staff, and students have access to information on the hazards of chemicals used in ATC program and work areas;

3. Faculty, staff, and students are provided with information on how to prevent injuries or illness due to exposure to chemicals used in YDC vocational programs;

4. Identification by job title the individuals who have the responsibility for maintaining the program, maintaining MSDS sheets, and conducting training.

Location of Program

The Hazard Communication Program shall be available to all faculty, staff, and students for review and a copy shall be located in the following areas:

1.

2.

3.

4.

Authority

The requirement to have a written Hazard Communication Program is contained in OSHA Standards at 29 CFR 1910.1200.

Hazard Determination

A "hazardous substance" is a physical or health hazard that is listed as such in either of the following:

1. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration; or

2. *Threshold Limit Values for Chemical Substances and Physical Agents in the Work Environment* (latest edition), American Conference of Governmental Industrial Hygienists (ACGIH).

A "hazardous substance" is regarded as a carcinogen or potential carcinogen if it is identified as such by any of the following.

1. National Toxicology Program (NTP), *Annual Report on Carcinogens* (latest edition).

2. International Agency for Research on Cancer (IARC) *Monographs* (latest edition).

3. 29 CFR Part 1910, Subpart Z, *Toxic and Hazardous Substances*, Occupational Safety and Health Administration.

Manufacturers, importers, and distributors will be relied upon to perform the appropriate hazard determination for the substances they produce or sell.

The following materials are not covered by the Hazard Communication Program.

1. Any hazardous waste as defined by the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976, as amended (42 USC 6901 et seq.) when subject to regulations issued under that act by the Environmental Protection Agency.

2. Tobacco or tobacco products.

3. Wood or wood products. Wood dust is a recognized health hazard, with exposure limits recommended by the American Conference of Governmental Industrial Hygienists to control employee exposure to the substance. Wood dust is to be considered a hazardous chemical and is subject to the requirements of the Hazard Communication Program including Material Safety Data Sheets and training.

    a) In those program areas where students are exposed to wood dust, they are to receive the same exposure control training and information as faculty.

4. Consumer products (including pens, pencils, adhesive tape) used in the work place under typical consumer usage. However, those items that can cause a medical reaction or health problems if used incorrectly shall have a MSDS available in the program and/or work area.

5. Articles (i.e. plastic chairs).

6. Foods, drugs, or cosmetics intended for personal consumption by employees while in the work place.

7. Foods, drugs, cosmetics or alcoholic beverages in retail stores packaged for retail sale.

8. Any drug in solid form used for direct administration to the patient (i.e. tablets or pills).

Application

The Hazard Communication Program applies to the use of any hazardous substance in program areas, program laboratories and shops, by management, and by maintenance personnel, which may expose employees and students under normal conditions of use or in a foreseeable emergency.

Responsibility for Compliance

The administration of this program shall be the responsibility of __(Title)_____.

The administrative responsibilities of this individual/position shall include the following.

1. Identification of the program and administrative areas to be included in the Hazard Communication Program. All identified areas shall be required to maintain MSDS.

2. Development and maintenance of a hazardous substance master inventory.

3. Coordination and supervision of employee training.

4. Coordination and supervision of the YDC's vocational program container labeling program.

5. Coordination of any necessary exposure monitoring.

6. Coordination and supervision of required recordkeeping.

7. Periodic evaluation of the overall program.

Instructors are responsible for insuring students follow all safe work practices and use all proper precautions required by the program and individual MSDS.

Hazard Materials Inventory

1. Each faculty member and employee shall responsible for compiling, maintaining, and updating, when necessary, a master list of hazardous substances used in their areas of responsibility. The inventory list shall be identified by a reference that is appropriate to the MSDS, product location, storage area, quantity, and MSDS information. Hazardous substances shall be listed alphabetically. Substances which are not in containers shall also be included on the inventory list, e.g., welding fumes, carbon monoxide from a fork lift, etc.

2. Appendix One contains the Hazard Chemical and Material Inventory.

3. Each ATC Principal shall maintain a master inventory of all hazardous materials used in the facility.

Labeling

____(Title)_____ shall be responsible for evaluating labels on incoming containers.

Each label must contain the following information:

1. Identity of the substance;

2. Appropriate hazard warning; and

3. Name and address of the manufacturer.

Inappropriate or Missing Labels

1. If a label is not appropriate or is missing, ____(Title)_____ shall notify the supplier that the label is not adequate and request a new label.

2. ____(Title)_____ shall send a second request to the supplier if the correct label is not received within 30 days.

3. ____(Title)_____ shall be responsible for preparing an appropriate label if one is not supplied by the manufacturer within the second 30 days.

4. A container will not be released for use until an appropriate label is affixed to the container.

5. Labels shall be removed if they are incorrect.

6. All users of hazardous materials (faculty, maintenance, etc.) are responsible for ensuring that all containers used in his/her area of responsibility are labeled properly and remain legible. Defacing labels or using them improperly is prohibited.

7. Unlabeled portable containers, such as pails and buckets, should be used by one employee and emptied at the end of each class period, or for maintenance personnel, at the end of the workday.

8. If a secondary container is to be used by more than one person, or over more than one day or class period, the responsible individual shall label the container with either a copy of the original label or with a hazardous material identification system label. One type of labeling system is the Hazardous Material Identification System (HMIS) for hazardous materials.

Material Data Safety Sheets

1. MSDS shall be available to all faculty, staff, and students on all hazardous chemicals and materials to which there is potential or actual exposure. Each instructor shall be responsible for maintaining the MSDS for his/her program areas. Maintenance personal personnel shall be responsible for maintaining the MSDS for the chemicals and materials used.

2. If the MSDS is not available, the chemical or materials shall not be used.

3. Each ATC Principal shall maintain a master file of all MSDS for the facility.

4. Each staff member responsible for MSDS shall update as necessary for the appropriate program, work area, etc., as well as, the ATCs master list.

5. Faculty, staff, and students shall have access to MSDS during the normal instructional and work day. The documents shall be maintained in a notebook labeled as containing MSDS. The location of the notebook shall also be identified. This is also known as a "Right to Know Center."

Employee and Student Training

Prior to starting work with hazardous substances, each employee and student shall attend a hazard communication training session where they shall receive information on the following topics.

1. Policies and procedures related to the Hazard Communication Program.

2. Location of the written Hazard Communication Program.

3. How to read and interpret an MSDS.

4. Location of MSDS.

5. Physical and health hazards of hazardous substances in their program or work area.

6. Methods and observation techniques to determine the presence or release of hazardous chemicals.

7. Work practices that may result in exposure.

8. How to prevent or reduce exposure to hazardous substances.

9. Personal protective equipment.

10. Procedures to follow if exposure occurs.

11. Emergency response procedures for hazardous chemical spills.

Upon completion of the training program, each employee and student shall sign a form documenting that he/she has received the training. This form shall be part of the ATC's training documentation.

Whenever a new employee is transferred or hired, or a new student enters the program, he/she shall be provided training regarding the Hazard Communication Program. The training session shall be conducted by ___(Title)_____ before the start of his/her employment if possible.

___(Title)_____ shall be responsible for identifying and listing any non-routine hazardous task performed YDC vocational program. ___(Title)_____ shall conduct training on the specific hazards of the job and the appropriate personal protective equipment and safety precautions and procedures.

When a new substance is added to the inventory list, the appropriate faculty or employee shall be responsible for reviewing the MSDS for potential health effects. If the product presents a new health hazard (causes health effects unlike those covered in the training session) the appropriate instructor or employee shall be responsible for notifying all affected instructors, staff, and students about the new health effects which result from exposure to the new substance.

Information To and From Contractors

_____(Title)_____ is responsible for providing outside contractors with the following information.

1. Hazardous chemicals to which they may be exposed as a result of working in this facility.

2. Suggestions for appropriate protective measures.

3. Labeling system used in the facility.

Contractors that are potentially exposed to hazardous chemicals present at the facility shall not be allowed to begin work until they have been provided information concerning these hazards and have signed a form to document this exchange. This form is contained in Appendix Two.

____(Title)_____ is responsible for obtaining information from contractors on all hazardous substances to which faculty, staff, and students may be exposed as a result of the contractor's work at the facility. __(Title)_____ shall notify affected instructors, staff, and students about the health affects that may result from exposure to each substance. This form is contained in Appendix Two.

Personnel Policies

When a faculty member, staff member, and/or student is not following safety and health rules regarding working with a hazardous chemical or material, disciplinary action shall be taken.

Documentation

1. All inactive MSDS shall be maintained by the YDC vocational program in a separate file, even if use of the substance has been discontinued.

2. If a faculty member, staff member, or student is exposure to a particular hazardous chemical occurs, the MSDS for that product will become part of the employee's medical records. These medical records must be kept for 30 years.

3. All inactive master inventory lists shall also be maintained.

Program Evaluation

____(Title)_____ shall conduct an evaluation of the Hazard Communication Program annually. The individual responsible for the items identified for improvement shall be notified in writing. It is expected that action shall be taken to correct the item within five working days.

The Hazard Communication Program shall also be included in the safety inspection conducted by the Cabinet's Safety Section.

Appendices: Hazardous Chemical and Material Inventory
Information To and From Contractors

Hazard Chemical and Material Inventory

Name of Facility:
Program or Department:
Date Inventory Completed:
Inventory Completed By:
(Complete an Inventory for Each Program and Department in the Facility)

Chemical Product (Name on Label and Generic if Known)	Chemical Product (Name on Label and Generic if Known)

Hazard Communication Program
Information from Contractor

YDC:_____

YDC Contract:_____

Contractor Name:_____

Contractor Address:_____

_____

_____

Phone Number:_____

FAX Number:_____

Project/Work Location:_____

Begin Date:_____ End Date:_____

List of all hazardous chemicals/materials that are to be brought into the ATC during the project. Describe the following for each chemical/material:

- How the chemical/material is to be used;
- Where the chemical/materials is to be used;
- Location of appropriate Material Data Safety Sheet;
- How and where the materials will be stored;
- Labeling system used to identify the chemicals/materials.

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I _____ (name of ATC contact) do hereby acknowledge receipt of the hazardous materials list from the contractor.

Date:_____

Original-Maintained by the Program Instructor
Copy-Maintained by the contractor

Hazard Communication Program
Information to Contractor

YDC:_____

YDC Contact:_____

Contractor Name:_____

Contractor Address:_____

_____

_____

Contractor Phone Number:_____

Contractor FAX Number:_____

Project/Work Location:_____

Begin Date:_____ End Date:_____

List of all hazardous chemicals/materials that are used in the project/work area which may create an actual or potential exposure . Describe the following for each chemical/material in the project/work area:

- How the chemical/material is to be used;
- Where the chemical/materials is to be used;
- Location of appropriate Material Data Safety Sheet;
- How and where the materials will be stored;
- Labeling system used to identify the chemicals/materials.

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I _____ (name of contractor) do hereby acknowledge receipt of the hazardous materials list from the ATC.

Date:_____

Original-Maintained by the contractor
Copy-Maintained by the Program Instructor